

March 20, 1998

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Office of the Secretary (1800)
Room 222, FCC
1919 M Street NW
Washington, DC 20554

Reference: RM-9242

Dear Commissioners:

I fully support and encourage the rapid adoption of the LPFM proposal as stated in proposal RM-9242 now before the commission. I would like the following comments to be considered in support thereof.

The sections covering LPFM-1 and LPFM-2 of this proposal would benefit hundreds of small communities and rural areas. Like ours, many communities have insufficient commercial revenue available to justify or maintain the expense of a full size standard commercial station operation. Still, they have a desperate need to have a real time means of disseminating local community information.

By way of illustration, the community in which my wife and I live is in a rural mountain area. It is an incorporated city with a population of about 1000 residents. It consists of one hardware/gas station, one grocery store and a post office. We have no means of disseminating information to the residents in a timely manner. Because of the small community size and rural location we do not have the financial resources in the area to support a large high power station with its high fees and operating costs. Our goal is not to cover the state, just our local area. To this end a LPFM-1 or LPFM-2 operation would be ideal. This would allow us to maintain our focus on serving the needs of the community and surrounding rural area.

Programming as a local information outlet can keep our operating costs low. For example, a small station may need to operate only in the evenings or perhaps 14 to 16 hours a day. In the morning people getting up for work could receive local information on weather conditions, what the school conditions are, reminders of local interest meetings or programs for that night. Evening programming could be discussions on area events, elections and concerns that only interest people who live in the area. Local school events could be covered, supported by only one or two merchants. Programs encouraging local youth participation could be generated to help curb delinquency and instill self confidence. Local youth could present programs to their peers about drugs and aids awareness. Youth in rural areas need programs that can teach them responsibility not vandalism. It could be a source for the elderly in the area who find it difficult to get out to get current and timely information on events and services that may benefit them and to know what's going on in the area. In the two short years my wife and I have lived in the community, fire has destroyed 4 homes displacing the families. A local station could be used to help find necessary donations to help the family at a time when they really need it. Larger station managers and program directors will not program information and events about small towns and rural areas 30, 40 or more miles away. At best they will program one announcement sometime during the day. They are not serving our areas.

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Currently, if the local school has a emergency notice to get out to the residents, there is NO local outlet. They must contact all the stations in Salem, Corvallis, Albany (30 to 40 miles away) or Portland (60 miles away) and hope that those stations will air the announcement. Which station will the local residents hear the message on? It's a "hit and miss" system at best. It just doesn't work!

In the past year our city had 3 occasions when a water line broke creating a health hazard. By the time a notice was typed up, mailed and received by all the affected residents, 2 days had passed. A LPFM-1 or LPFM-2 operation could be utilized to communicate this type of information in a timely manner. This type of station with a low operating cost would not have to be dependent on every one listening 24 hours a day and selling out the entire day to make operating costs.

We have elections coming up for city council positions and ballot measures. None of the candidates has the financial resources to buy time on stations 30 or more miles away. That advertising would do them very little if any good. We also have county elections and ballot measure to be voted on. A station licensed under this proposal could carry discussions and call in shows so the area residents could become more informed about the candidates.

Currently the only station in our county is a 5 KW AM in a neighboring town 10 miles away. They program Spanish only, full time. Their only interest is targeting the Hispanic population and activities in a community 15 miles east of the station and the Hispanic population between there and Portland, 60 miles away. We don't object to their efforts or goals, but we do ask for a system to address our needs too. According to the 1990 US Census, Polk County Oregon in which this station is centered, has a total population of 45,541 of which 2,802 are Hispanic. The result of this is that over 42,700 county residents who do not speak Spanish must listen to news and information about cities 30 to 70 miles away. This proposal would allow our community, the three nearby communities and the hundreds of other communities like ours to have a real time outlet. We could then disseminate community and school news, information and activities truly "IN THE COMMUNITY and PUBLIC INTEREST" that stations 30 miles or more away will not even consider covering.

I would expect that the "Big Boys" would argue that they will lose revenue to these small operations. I submit that this would not be the case as most of the areas that would utilize these classes of stations would be in locations where the corporate stations don't even sell now. In areas like ours, the merchants can't afford nor will they spend the money required by those stations for advertising that is received by people living 30 to 60 miles from their businesses.

As a employee in the broadcasting community for over 30 years I have seen the "big guys" continue to take over the small operations and be more concerned about the bottom line dollar than the community interest. We understand that the NAB is a powerful lobby and would expect them to be opposed to this proposal. However, might alone does not make right. In many cases small standard commercial stations have been forced to sell because the licensing fees and operating costs were too high. When they sold to larger companies, the community suffered and lost. In order to increase the dollars, the station owners went to outside programming and lost touch with the local communities and their needs. Small communities need "small town radio" and "small town radio" needs to be locally owned and operated and allowed to operate without burdensome fees and expenses. Larger "metro stations" target a much different audience with a different agenda than small

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local stations.

Addressing the "Special Events - LPFM-3" class: this was a stroke of genius. We have all seen many occasions where an informal station such as is described in the "LPFM-3" section could be used at fairs, festivals and local outdoor events. Serving as a "public address system," the stations could be used to inform participants of parking areas, ticket gate locations and a schedule of events. Seldom is it feasible to "wire" a large area with speakers for addressing the public. The "walkman" and automobile radios are perfectly suited for this service, and the LPFM-3 for them.

I would like to make one additional suggestion: priority for the LPFM-2 class over the translators and boosters currently in use and those being added. These translators and boosters are generally being used to increase coverage of full power stations well outside of their market areas. In several cases here, I am able to hear the same programming on multiple frequencies. This could be caused by the fact that there are 204 translators compared to 154 FM stations in Oregon -- a possible misuse of precious FM spectrum, and not necessarily in the public interest of the areas they cover. Those figures were obtained from the "on-line" FCC database for Oregon.

If the Commission will allow LPFM stations and allow them to operate without such high licensing fees, we can return to the job of providing what the community needs and not be as concerned with filling the coffers to stay on the air.

The current FM licensing system is too expensive, cumbersome and slow for most people. This is especially true if a channel assignment is also needed. Give the people who work to get the channel assignment first choice for operating on that channel. Although it may not have been the intent, the current licensing process discourages many who have limited resources. Please hear our plea for help and a licensing structure that will allow "the little guy" to own, operate and disseminate our community and area information without over burdening our resources. This is a proposal that is desperately needed by many small communities throughout the country and is long overdue.

I encourage the Commission to enact the LPFM licensing structure (RM-9242) as proposed. It would be a great day for numerous small communities and the country as a whole, and would put "IN THE PUBLIC INTEREST" back into radio.

Sincerely,



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